

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**NOTICE OF NEW SUPREME COURT AUTHORITY  
RELEVANT TO PENDING SUMMARY JUDGMENT MOTION**

Plaintiffs respectfully bring to the Court's attention the U.S. Supreme Court's decision in *Johnson, et al. v. City of Shelby*, No. 13–1318 (Nov. 10, 2014) holding that under Rule 8(a) of the Federal Rules of Civil Procedure a complaint need only plead facts, and need not invoke provisions of law or legal theories. (Exhibit 1).

Defendants have argued in their summary judgment motion that plaintiffs are precluded from relying on provisions of law that are not specifically cited in their First Amended Complaint. Plaintiffs have previously refuted this argument, and *City of Shelby* constitutes further—and dispositive—authority for rejecting defendants' argument in this regard.

Dated: New York, New York  
November 12, 2014

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By: /s/ Kent A. Yalowitz

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